

## **Exhibit E**

### **Declaration of Daniel L. Sachs**

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**Case No: 1:22-cv-22538 (ALTMAN/REID)**

DOMNIK KARNAS, et al.,

Plaintiffs,

v.

MARK CUBAN, et al.

Defendants.

**DECLARATION OF DANIEL L. SACHS IN SUPPORT OF DEFENDANTS MARK  
CUBAN'S AND DALLAS BASKETBALL LIMITED'S REPLY IN SUPPORT OF THEIR  
MOTION TO EXCLUDE EXPERT REPORT AND TESTIMONY OF LEE REINERS**

I, Daniel L. Sachs, Esq. under penalty of perjury, state as follows:

1. I am an attorney with Brown Rudnick, LLP duly admitted to practice in the District of Columbia, California, and New York and admitted *pro hac vice* to practice before this Court. I am counsel for Defendants Mark Cuban and Dallas Basketball Limited d/b/a Dallas Mavericks (collectively, the “Defendants”) in the above-captioned action. I submit this Declaration in support of Defendants’ Reply In Support of Their Motion to Exclude the Expert Report and Testimony of Lee Reiners (ECF No. 253).

2. Filed herewith as **Exhibit A** is a true and correct copy of the webpage linked at page 21, footnote 67 of the Reiners Report, as accessed by the undersigned on May 1, 2024.

3. Filed herewith as **Exhibit B** is a true and correct copy of the webpage linked at page 21, footnote 68 of the Reiners Report, as accessed by the undersigned on May 1, 2024.

4. Filed herewith as **Exhibit C** is a true and correct copy of the webpage linked at page 21, footnote 69 of the Reiners Report, as accessed by the undersigned on May 1, 2024.

5. Filed herewith as **Exhibit D** is a true and correct copy of excerpts from the transcript of the deposition of Lee Reiners from March 28, 2024, in the above-captioned matter and referenced in Defendants’ Reply.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 1, 2024, in Washington, D.C.

By:s/ Daniel L. Sachs  
Daniel L. Sachs